IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

SYMBOLOGY INNOVATIONS, LLC

Plaintiff,

Civil Action No. 2:23-cv-419-JRG-RSP

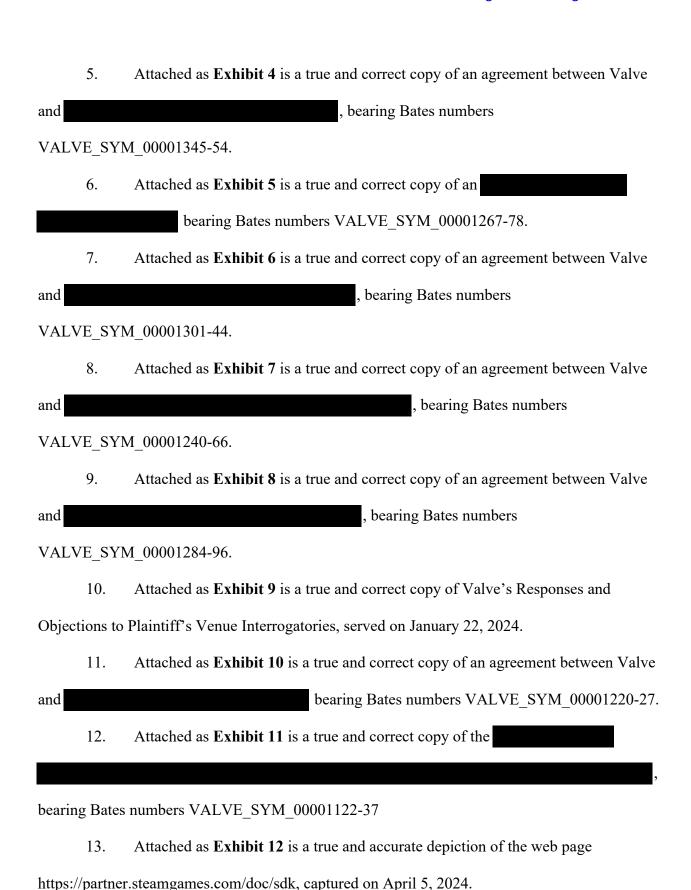
v.

JURY TRIAL DEMANDED

VALVE CORPORATION, GEARBOX SOFTWARE, LLC Defendant. FILED UNDER SEAL

DECLARATION OF KATHLEEN R. GEYER IN SUPPORT OF DEFENDANT VALVE CORPORATION'S MOTION TO DISMISS UNDER FEDERAL RULE OF CIVIL PROCEDURE 12(B)(3) FOR IMPROPER VENUE

- I, Kathleen R. Geyer, hereby declare as follow:
- 1. I am an attorney at the law firm of Kilpatrick, Townsend, & Stockton. I am counsel for Valve Corporation ("Valve"). I am admitted to practice before this Court, and I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.
- 2. Attached as **Exhibit 1** is a true and correct copy of the Global Settlement and License Agreement, executed between Valve Corporation, Display Technologies, LLC, and Leigh Rothschild on January 11, 2016.
- 3. Attached as **Exhibit 2** is a true and correct copy of an executed Steam Site Licensing Program License dated September 6, 2018, bearing Bates numbers VALVE SYM 00001206-10.
- 4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the Rule 30(b)(6) Deposition of Valve's corporate representative, Christopher Schenck, taken on February 5, 2024.



- 14. Attached as **Exhibit 13** is a true and correct copy of the Termination of Product Development Agreement between Valve, L.L.C. and Gearbox Software, L.L.C. terminating the Product Development Agreement dated August 21, 2001, bearing Bates numbers VALVE_SYM_00001178-88.
- 15. Attached as **Exhibit 14** is a true and accurate depiction of the web page https://store.steampowered.com/app/1286680/Tiny_Tinas_Wonderlands/, captured on April 5, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2024

/s/ Kathleen R. Geyer
Kathleen R. Geyer